

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

CARL G. SIMPSON, et al.,

Plaintiffs,

COPY

VS.

Civil Action No: C-1-000014

INTERMET CORPORATION, et al.

Defendants.

DEPOSITION OF PAUL KELLEY

The deposition of Paul Kelley was taken on July 15, 2003 at the approximate hour of 9:00 a.m., at 215 South Fourth Street, Ironton, Ohio.

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1 Q. How long were you a laborer before you moved to
2 some other job?

3 A. Well, I was classified as laborer all the way
4 through.

5 Q. Were you? At some point did you -- as a laborer,
6 were you assigned to the I-Beam division?

7 A. Yes. I was always in the I-Beam division?

8 Q. When did you begin working on the Sutters as
9 either a helper or an operator?

10 A. Let's see -- that would be -- I can't --

11 Q. Your best testimony.

12 A. Early '99.

13 Q. Four or five months after you got there perhaps?

14 A. Yes.

15 Q. From that point on, did you work as a Sutter
16 operator/helper pretty much regularly?

17 A. Yes. Unless they needed me somewhere else. I
18 was kind of like scattered around. But most of time, I
19 was on the Sutters.

20 Q. 80 percent of the time?

21 A. Yes.

22 Q. Did you work generally with one particular person
23 when you were on the Sutters or one more than others?

24 A. Depending on the shift. If we were on second